### REMARKS/ARGUMENTS

### STATUS OF THE APPLICATION

Claims 1, 2, 4-21, and 23-41 were pending in this application and examined. Claims 1, 20, and 39 are rejected under 35 U.S.C. 102(e) as being anticipated by Nielsen (US Patent 6,339,437). Claims 11 and 30 are rejected under 35 U.S.C. 102(a) as being anticipated by Acrobat Reader (published in 1999; "Acrobat"). Claims 2, 5, 21, and 24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Nielsen in view of Gounares et al. (US Patent 6,681,370; "Gounares"). Claims 4 and 23 are rejected under 35 U.S.C. 103(a) as being unpatentable over Nielsen in view of MSDN Online Web Workshop (published online on April 20, 2000; "MSDN Workshop"). Claims 6-8 and 25-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over Nielsen in view of Okamoto et al. (US Patent Application Publication No. 2002/0065814; "Okamoto"). Claims 9-10 and 28-29 are rejected under 35 U.S.C. 103(a) as being unpatentable over Nielsen in view of Schultz (US Patent 5,721,902). Claims 12-13, 17-18, 31-32, and 36-37 are rejected under 35 U.S.C. 103(a) as being unpatentable over Acrobat Reader. Claims 14-15, 19, 33-34, 38, and 40-41 are rejected under 35 U.S.C. 103(a) as being unpatentable over Acrobat Reader in view of Nielsen. Claims 16 and 35 are rejected under 35 U.S.C. 103(a) as being unpatentable over Acrobat Reader in view of Nielsen and further in view of Okamoto et al.

Claims 1, 7, 10, 11, 16, 19, 20, 26, 29, 30, and 38-41 have been amended.

# THE CLAIMS Claim 1

Claim 1 is rejected under 35 U.S.C. 102(e) as being anticipated by Nielsen.

Applicant submits that claim 1 is not anticipated by Nielsen and has amended claim 1 to further clarify the differences.

Claim 1 has been amended to emphasize that <u>previously defined information</u>

comprising associations between a plurality of text patterns and a plurality of concepts is used to identify text patterns that are associated with one or more concepts selected by a user. The text

patterns identified from the previously defined association information are then used to search a document.

For example, amended claim 1 recites, in part,

receiving user input selecting a set of one or more concepts from a plurality of concepts; identifying, from previously defined information comprising associations between a plurality of text patterns and the plurality of concepts, one or more text patterns in the plurality of text patterns that are associated with at least one concept in the set of concepts;

searching the document to identify occurrences of the one or more text patterns in the document ... (Applicant's claim 1, emphasis added)

As per claim 1, a user has to only select "a set of one or more concepts" from multiple concepts. Text patterns corresponding to the user-selected concepts are automatically identified using the previously defined association information and the identified text patterns are then used to search the document to identify sections of the document that are relevant to the user-selected concepts. In this manner, the user does not have to explicitly specify (or even know) the search terms that are associated with a concept and used for searching the document. The invention recited in claim 1 thus saves the user from the hassles of specifying search query terms for searching the document for a concept -- the intelligence behind the searching is "hidden" from the user. This enables the embodiment of the present invention recited in claim 1 to be used by even a non-technical user who is not savvy about searching techniques. Support for this amendment can be found in the specification at, for example, page 7, line 33 - page 8, line 6, and page 10, lines 8-25.

Applicant submits that Nielsen does not teach or suggest the idea of using previously defined association information to identify text patterns that are associated with user-selected concepts, and then using the identified text patterns to search a document. Rather, Nielsen apparently discloses a method of document searching using search terms that are explicitly specified by a user as part of an information retrieval query. For example, Nielsen states "the document text is examined and passed through a text filter to identify terms within the text which match one or more query terms." (Col. 4, lines 56-68) Furthermore, in rejecting claim 1, the Examiner asserts, "Nielsen discloses a method in which search terms are supplied via user queries and a document is searched to identify text patterns that match those search terms."

Since the search terms of Nielsen are "supplied via user queries," Nielsen does not make use of previously defined associations between text patterns and concepts to identify text patterns to be searched. Indeed, the invention of Nielsen does not need to identify such text patterns because the text patterns (i.e. search terms) are explicitly specified by the user as part of a search query. Thus, unlike claim 1, Nielsen does not teach or suggest "identifying, from previously defined information comprising associations between a plurality of text patterns and the plurality of concepts, one or more text patterns in the plurality of text patterns that are associated with at least one concept in the set of concepts; [and] searching the document to identify occurrences of the one or more text patterns in the document ..."

Accordingly, Applicant submits that claim 1, as amended, is not anticipated by Nielsen for at least the reasons discussed above. Further, Applicant believes that other references cited by the Examiner also fail to disclose such a concept. Applicant thus submits that claim 1 is in a condition for allowance.

#### Claims 2 and 4-10

Applicant submits that dependent claims 2 and 4-10 which depend either directly or indirectly from claim 1, should be allowed for at least a similar rationale as discussed for allowing claim 1, and others. Further, the dependent claims recite additional features which make the claims patentable for additional reasons.

### Claim 11

Claim 11 is rejected under 35 U.S.C. 102(a) as being anticipated by Acrobat Reader. Applicant submits that claim 11 (even in its previous unamended state) is not anticipated by Acrobat and has amended claim 11 to further emphasize the differences from Acrobat.

As recited in claim 11, the <u>display of the contents of the single thumbnail image is</u> <u>dynamically changed to reflect a change in the display of the document in the first viewing area.</u>

Thus, for example, a user may cause a change in the display of the document in the first viewing area. This may be caused in various ways. For example, the user may modify a style associated

with annotations of text entities from bolded text to underlined text. This style change may cause a change in the display of the document in the first viewing area where all previously bolded text entities are now changed to underlined text entities. As recited in claim 11, the display of the contents in the thumbnail image is also dynamically changed to reflect the change in the display in the first viewing area. Accordingly, the previously bolded text entities displayed in the thumbnail image are dynamically changed to underlined text entities. The change is made throughout the contents of the thumbnail image, irrespective of the section of the document viewed by the user in the first viewing area. Applicant submits that Acrobat does not teach or suggest this concept of dynamically changing display of contents in the thumbnail image to reflect a change in the display of the document in a first viewing area.

In rejecting claim 11, the Examiner asserts, "Acrobat also discloses that the portion of the thumbnail window corresponding to the part of the document being displayed is highlighted (emphasized) and changed dynamically as the portion that is viewed is changed to a different portion." Applicant submits that in Acrobat, a change in the portion of the document viewed by the user merely causes a change in the "thumbnail window" that is superimposed on a thumbnail -- not in the display of the contents of the thumbnail image itself.

Applicant submits that the "thumbnail window" and the "thumbnail image" are two different and independent entities. For example, as recited in claim 11, the "thumbnail image" displays contents of the document in a continuous form. As stated in the specification, the thumbnail image "displays the actual contents of the document, including forms, text, images, etc. ..." (Specification, page 6, line 31). In contrast, the "thumbnail window" depicted in Acrobat is comparable to the lens or viewing window described in the specification (e.g., on page 7, lines 15-17, reference 214A in Fig. 2A) that covers the part of the elongated thumbnail image corresponding to the document section displayed in the first viewing area. The thumbnail window in Acrobat is superimposed on top of a thumbnail image to help orient the user as to his or her current viewing location within the overall document -- the thumbnail window is not a "part" of the thumbnail image.

As recited in claim 11, the display of the <u>contents of the thumbnail image</u> are dynamically changed when the display of the document in the first viewing area changes -- this

is substantially different from changing the size or location of the thumbnail window that is superimposed on a portion of the thumbnail image and is not part of the thumbnail image. As a result, Applicant submits that in Acrobat the size or location of the thumbnail window changes with a change in the size or location in the document, but the display of the contents of the thumbnail image is not dynamically changed, as recited in claim 11.

In light of the above, Applicant submits that claim 11 is not anticipated by Acrobat for at least the reasons stated above. Accordingly, Applicant submits that claim 11 is in a condition for allowance.

### Claims 12-18

Applicant submits that dependent claims 12-18 which depend either directly or indirectly from claim 11, should be allowed for at least a similar rationale as discussed for allowing claim 11, and others. Further, the dependent claims recite additional features which make the claims patentable for additional reasons.

### Claims 20-21, 23-29, and 39

Applicant submits that independent claims 20 and 39 should be allowed for at least a similar rationale as discussed for allowing claim 1, and others. Further, Applicant submits that dependent claims 21 and 23-29 which depend either directly or indirectly from claim 20, should be allowed for at least a similar rationale as discussed for allowing claim 20, and others. Further, the dependent claims recite additional features which make the claims patentable for additional reasons.

### Claims 30-37 and 40

Applicant submits that independent claims 30 and 40 should be allowed for at least a similar rationale as discussed for allowing claim 11, and others. Further, Applicant submits that dependent claims 31-37 which depend either directly or indirectly from claim 30, should be allowed for at least a similar rationale as discussed for allowing claim 30, and others. Further, the dependent claims recite additional features which make the claims patentable for additional reasons.

### Claims 19, 38, and 41

Applicant submits that independent claims 19, 38, and 41 should be allowed for at least a similar rationale as discussed for allowing claim 1, and others. The claims also recite additional features that make the claims patentable for additional reasons.

## **INFORMATION DISCLOSURE STATEMENT (IDS)**

An IDS is filed herewith. The IDS cites a reference used in an Office Action dated 06/28/05 received in U.S. Application No. 10/214,380 (Attorney Docket No.: 015358-004251US) filed August 6, 2002, which is related to the present application. The Examiner is requested to consider the prosecution of the 10/214,380 application during prosecution of the present application.

### **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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